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Automatic Data Processing, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATIENT CARE ASSOCIATES, LLC a/s/o
PATRICIA M.,

Plaintiff,

vs.

AUTOMATIC DATA PROCESSING, INC.
ET AL.,

Defendants.

Civ. No. 12-3718 (DRD/PS)

**CERTIFICATION OF
PATRICK J. MURPHY, III**

I, Patrick J. Murphy, III, hereby certify and state:

1. I am an attorney at law at Connell Foley LLP, am admitted to practice before the Court, and am counsel of record for Defendant Automatic Data Processing, Inc. (hereinafter “ADP”) in the above-referenced matter.

2. ADP is hereby requesting the entry of an Order permanently Sealing the Confidential Certification of Michael C. McNamara with Confidential Exhibits 1-7 annexed thereto (hereinafter the “Confidential Exhibits”) that were filed under temporary seal on February 8, 2013, in support of ADP’s pending Motion for Summary Judgment. (Doc. Nos. 16, 17).

3. This motion is made pursuant to Local Civil Rule 5.3(c) and pursuant to the Discovery Confidentiality Order entered on January 23, 2013. (Doc. No. 15). A true and accurate copy of the Discovery Confidentiality Order is attached hereto as **Exhibit A**.

4. In support of ADP's present Motion to Seal, I have prepared a Chart identifying each of the Confidential Exhibits containing the confidential information to be sealed and further explaining: (a) the legitimate private or public interests which warrant the relief sought; (b) the clearly defined and serious injury that would result if the relief sought is not granted; (c) why a less restrictive alternative to the relief sought is not available; and (d) the position of the Plaintiff concerning the request to seal. A copy of the Chart is attached hereto as **Exhibit B**.

5. Redacted and unredacted versions of the documents to be sealed are attached hereto as **Exhibit C**:

<u>Exhibit</u>	<u>Description</u>	<u>Portions Subject to a Sealing Request</u>
C	Certification of Michael C. McNamara with Exhibit A and Confidential Exhibits 1-7	Confidential Exhibits 1-7

6. All other information contained in the Confidential Certification of Michael C. McNamara has been filed publicly on the docket. (Doc. No. 16, Entry # 5-7).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: March 1, 2013

s/ Patrick J. Murphy, III
Patrick J. Murphy, III